## **United States Bankruptcy Court District Of New Jersey**

Caption In Compliance With D.N.J. LBR 9004-1

## **Duane Morris LLP**

A Delaware Limited Liability Partnership

Jeff D. Kahane, Esquire (*Pro Hac Vice* Admission Pending) 865 South Figueroa Street, Suite 3100 Los Angeles, CA 90017-5450

Telephone: (213) 689-7431 Facsimile: (213) 403-6372

E-mail: JDKahane@duanemorris.com

Counsel for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen)

In Re:	Chapter 11
LTL Management LLC,	Case No. 21-30589
Debtor.	Judge: Michael B. Kaplan
In Re:	A.J., No. 21 02022 (MDK)
LTL MANAGEMENT LLC,	Adv. No. 21-03032 (MBK)
Plaintiff,	
v.	
THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,	
Defendants.	

## **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS**

PLEASE TAKE NOTICE that Duane Morris LLP ("Duane Morris"), acting by and through Jeff D. Kahane, hereby appears in the above-captioned case as counsel for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability in interest Republic Insurance Company (as successor Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch

company Rheinland Verzekeringen), and requests, pursuant to Federal Rules of Bankruptcy

Procedure 2002, 9007, and 9010(b), that copies of all notices, documents and pleadings given or

filed in the above-captioned case be given and served upon:

Jeff D. Kahane, Esquire

(*Pro Hac Vice* Admission Pending) 865 South Figueroa Street, Suite 3100

Los Angeles, CA 90017-5450

Telephone: (213) 689-7431

Facsimile: (213) 403-6372

E-mail: JDKahane@duanemorris.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes, without

limitation, any notice, application, complaint, demand, motion, petition, pleading or request,

whether formal or informal, written or oral and whether transmitted or conveyed by mail, e-mail,

facsimile, telephone, telegraph, or otherwise filed or made with regard to the above-captioned case

and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any

subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Republic's:

(i) right to have final orders in non-core matters entered only after de novo review by a higher

court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or

proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to

mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or

recoupments to which Republic is or may be entitled under agreements, in law, or in equity, all of

which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

DOCUMENTS:

X All notices entered pursuant to Fed. R. Bankr. P. 2002.

X All documents and pleadings of any nature, including claim objections.

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Respectfully submitted,

Duane Morris LLP A Delaware Limited Liability Company

/s/ Jeff D. Kahane

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Dated: August 4, 2022